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July 28, 2011

Leigha Schmidt  
Project Planner  
City of Pittsburg  
65 Civic Avenue  
Pittsburg, CA 94565

Subject: Pittsburg/Bay Point BART Master Plan Draft Environmental Impact Report

Dear Ms. Leigha Schmidt:

Bay Area Air Quality Management District (District) staff has reviewed your agency's Draft Environmental Impact Report (DEIR) for the Pittsburg/Bay Point BART Master Plan project (Project) located in the City of Pittsburg (City). We understand that the Project consists of a Master Plan outlining land use and design requirements within a 50.6 acre portion of the City in the vicinity of the Pittsburg/Bay Point BART station. The Project is expected to result in a mix of uses including medium- and high-density residences, two parking garages, retail, a transit plaza/bus shelter and a number of "flex" uses which may be any mix of retail, commercial or quasi-public uses, depending on future market conditions. Overall, the Project is expected to result in the addition of 1,168 dwelling units and 146,362 square feet of nonresidential uses employing approximately 1,300 people.

District staff has the following specific comments on the Project's environmental analysis.

**Risks and Hazards for New Receptors Analysis**

The DEIR identified potentially significant impacts to future sensitive receptors from toxic air contaminants (TAC) and PM<sub>2.5</sub> due to traffic on SR-4. The DEIR included MM 4.6.5b to reduce this impact below the level of significance. MM 4.6.5b requires all future development proposals to conduct air dispersion modeling to determine if the project specific mitigation measures in MM 4.6.5b should be implemented. While the District supports this approach to assess and mitigate potential adverse impacts for areas above the District's risk and hazard significance threshold, modeling should not be required for the project areas that are outside the 10 in a million risk threshold. The District's current Highway Screening Analysis Tool for SR-4 indicates that the project alone risk and hazard threshold of 10 in a million extends approximately 900 feet south of SR-4. Therefore, the modeling requirements of MM 4.6.5b should not be applied to any proposed development outside of this area.

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In addition to the measures listed in MM 4.6.5b, the City should consider the location and phasing of sensitive land uses in the Project area.

1. Housing and land uses that may result in long-term exposure of new sensitive receptors to TAC's should be placed away from major emission sources. Therefore, the District encourages the City to consider a site design which would avoid the placement of sensitive receptors within close proximity of SR-4. Several uses outlined in the Project, including two parking garages, a detention basin, and commercial/office space would be better suited closer to SR-4, providing a buffer to future sensitive receptors by placing them at a greater distance from SR-4. A land use design consistent with the Contra Costa County adopted "Pittsburg/Bay Point BART Station Area Specific Plan" (June 2002) would provide greater protection for future sensitive receptors than the current site design shown in the Project. According to the land use distributions on pg. 21 of the "Pittsburg/Bay Point BART Station Area Specific Plan", commercial units, a parking garage, and a BART bus area are located closest to SR-4, and the residential units are located to the south (farther from SR-4).
2. The distance from SR-4 at which the estimated risk and PM2.5 concentrations exceed the District's thresholds of significance should decrease in future years, in response to emission reductions from the California Air Resources Board diesel regulations and turnover in the motor vehicle fleet (see pg. 19 of the District's Recommended Methods for Screening and Modeling Local Risks and Hazards). Therefore, the City could also require that the Project include phasing, so that proposed sensitive land uses within the TAC impacted area would only be developed when dispersion modeling indicates that risk and hazards impacts would be less than the 10 in a million threshold.

#### **Criteria Air Pollutants Emissions Analysis**

Emissions from long-term operational activities associated with implementation of the Project exceed the District's significance threshold for criteria pollutants. The Bay Area is currently in non-attainment for health based state and federal ozone and particulate matter standards. The emissions from this project should be mitigated to the maximum extent feasible to ensure this project does not adversely affect attainment of national and state air quality standards. In addition to the mitigation measures outlined on pg. 4.6-32 and 4.6-33 of the DEIR, District staff has identified additional feasible mitigation measures that should be made conditions of approval for all subsequent development within the Project area:

- Unbundle parking costs from rents and leases;
- Require employers to offer parking cash-out and transit subsidies to employees;
- Employer trip reduction programs;
- Carpool parking preferences;
- Electric vehicle charging stations.

In addition to these mitigation measures, we suggest that the City require an access road for vehicles (as shown in Figure 3.0.5 in the DEIR) between the Project, the adjacent shopping center, and the western portion of the Project (depicted as Medium Density Residential) in order to reduce vehicle miles of travel and ensure convenient access for pedestrians and bicyclists.

#### **Greenhouse-Gas (GHG) Emissions Analysis**

According to the DEIR, the Project yields a metric ton per service population (SP) ratio of 4.79 for build-out conditions. District staff understands that the City utilized an operational emissions

threshold of 6.6 MT CO<sub>2</sub>e/SP/yr. However, as is stated on pg. 2-7 of the District's 2010 CEQA Guidelines, this threshold is only intended to be applied to general plans. Other plans, including specific plans, congestion management plans, etc., should use the project-level threshold of 4.6 MT CO<sub>2</sub>e/SP/yr. (Alternatively, the Guidelines provide the option to use a threshold of 1,100 MT CO<sub>2</sub>e/yr, or to develop and implement a Qualified GHG Reduction Strategy). We recommend that the City compare operational GHG emissions to the District's 4.6 MT CO<sub>2</sub>e/SP/yr project-level threshold (if the City chooses to use a service population metric). Since the Project just barely exceeds the 4.6 MT CO<sub>2</sub>e/SP/yr project-level threshold of significance for operational GHG emissions, implementation of the feasible mitigation measures listed below should ensure the Project does not result in significant GHG impacts.

- Achieve energy efficiency performance that exceeds 2008 Title 24 standards by 20%;
- Require on-site renewable energy systems, such as wind turbines, solar photovoltaic or solar hot water heating systems;
- Unbundle parking costs from rents and leases;
- Require employers to offer parking cash-out and transit subsidies to employees;
- Employer trip reduction programs;
- Carpool parking preferences;
- Electric vehicle charging stations.

District staff recommends utilizing the 2010 CEQA Guidelines (<http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines%20May%202011.ashx?la=en>) as well as the CAPCOA report entitled "Quantifying Greenhouse Gas Mitigation Measures" (<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>) for additional information on mitigation measures and quantification methodologies.

District staff is available to assist City staff in addressing these comments. If you have any questions, please contact Jackie Winkel, Environmental Planner, (415) 749-4933.

Sincerely,



For Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director John Gioia  
BAAQMD Director David Hudson  
BAAQMD Director Mark Ross  
BAAQMD Director Gayle Uilkema  
BART Deputy Manager Val Menotti  
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